

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC.;
ANYTHING GOES LLC d/b/a MAIL
BOXES ETC., and JCK INDUSTRIES,
INC., on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., *et al.*,

Defendants.

Case No.: 08-CV-00042 (BMC) (PK)

**DECLARATION OF
BENJAMIN M. JACCARINO, ESQ.,
IN SUPPORT OF PLAINTIFFS' MOTION
FOR REIMBURSEMENT OF EXPENSES
FILED ON BEHALF OF
LOVELL STEWART HALEBIAN
JACOBSON LLP**

I, Benjamin M. Jaccarino, Esq., declare and state as follows:

1. I am a Partner at the law firm of Lovell Stewart Halebian Jacobson LLP. I submit this Declaration in support of Plaintiffs' petition for an award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation since the last petition for reimbursement of cost and expenses made in July 2016.

2. My firm is one of four Co-Lead Counsel appointed by this Court to represent Plaintiffs and the Plaintiff class in this class action. As detailed in Exhibit 1, my firm has incurred a total of \$25,919.92 in unreimbursed expenses during the period August 1, 2016 through the Present.

3. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

4. During the period August 1, 2016 through present, my firm has been involved in the following activities on behalf of the Plaintiffs, and incurred expenses as a result of these and other activities:

- Engaged in extensive work regarding settlement administration. This included numerous in person meetings with the court-appointed claims administrator to work to appropriately administer and distribute the settlement funds;
- Updated named plaintiffs and the class members on the status of the settlements, their claims, and the distribution process;
- Worked with the court-appointed claims administrator to address and resolve class member questions regarding the settlement administration process;
- Worked with the court-appointed claims administrator to address, review, and audit class member claims and to ensure that each claim was adequately supported;
- Reviewed, edit, and comment on proposed correspondence from the claims administrator to class members concerning their submitted claims;
- In person and telephonic meet and confers with class members and their representatives concerning disputes that have arisen during the claims administrator process concerning the appropriate quantum of evidence required to support claims, the appropriate pro rata award to certain class members, and other issues;
- Assisted the claims administrator in its fraud prevention and auditing processes; and

- Engaged in appellate briefing, and settlement discussions with the Chinese Chamber of Commerce concerning its claim including participating in mediation through the United States Court of Appeals for the Second Circuit mandatory mediation program.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 15th day of July 2020, at San Diego, California.

/s/ Benjamin M. Jaccarino
Benjamin M. Jaccarino Esq.

EXHIBIT 1

Precision Associates, Inc., et al., v. Panalpina World Transport (Holding) Ltd., et al.
Eastern District of New York Case No. 1:08-cv-00042-JG-VVP
Exhibit - Summary of Expenses
Firm Name: Lovell Stewart Halebian Jacobson LLP

Time Period: August 1, 2016 to the Present

Type of Expense	Cumulative Total
Assessments to Common Cost Litigation Fund	
Commercial Copies	\$37.37
Internal Reproduction / Copies	
Court Costs & Filing Fees	
Court Reporters & Transcripts	\$139.86
Computer Research	\$87.92
Telephone & Fax	
Postage / Express Delivery / Messenger	\$1,309.64
Professional Fees (expert, investigator, accountant, etc.)	\$13,700.00
Witness / Service Fees	
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$10,645.13
Clerical Overtime	
Miscellaneous	
TOTAL EXPENSES	\$25,919.92